

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DR. SHIVA AYYADURAI,

Plaintiff,

v.

WILLIAM FRANCIS GALVIN, in his official
capacity as the Secretary of the Commonwealth
of Massachusetts and his individual capacity,
MICHELLE TASSINARI, in her individual
capacity, DEBRA O'MALLEY, in her individual
capacity, AMY COHEN, in her individual capacity,
and NATIONAL ASSOCIATION OF STATE
ELECTION DIRECTORS

Defendant.

CIVIL ACTION
NO. 1:20-cv-11889-MLW

**MOTION TO STRIKE BY WILLIAM FRANCIS GALVIN, MICHELLE TASSINARI,
AND DEBRA O'MALLEY**

For the reasons set forth in the accompanying memorandum, Secretary of the Commonwealth William Francis Galvin, Michelle Tassinari, and Debra O'Malley ask this Court to strike two pleadings filed on July 22, 2021 over the signature of only Shiva Ayyadurai but not his counsel of record in violation of Fed. R. Civ. P. 11(a): the Revised Second Amended Complaint (Dkt. No. 167) and the Memorandum of Law in Support of Plaintiff's Claims (Dkt. No. 166). Alternatively, the Defendants ask this Court to at very least strike or seal pursuant to Fed. R. Civ. P. 12(f) and Fed. R. Civ. P. 5.2(e) portions of the Revised Second Amended Complaint that contain the personal home addresses and photographs of the individual Defendants.

Respectfully submitted,

Defendants,

WILLIAM FRANCIS GALVIN, in his official and individual capacities, MICHELLE TASSINARI, in her individual capacity, and DEBRA O'MALLEY, in her individual capacity,

By their attorneys,

MAURA HEALEY
ATTORNEY GENERAL

/s/ Adam Hornstine
Anne Sterman (BBO No. 650426)
Adam Hornstine (BBO# 666296)
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Date: July 28, 2021

LOCAL RULE 7.1 CERTIFICATION

I, Adam Hornstine, Assistant Attorney General, hereby certify that on July 26, 2021, I met and conferred with counsel for Plaintiff in a good faith attempt to narrow resolve or narrow the grounds for this motion but was unable to do so.

/s/ Adam Hornstine
Adam Hornstine

CERTIFICATE OF SERVICE

I, Adam Hornstine, Assistant Attorney General, hereby certify that I have this day, July 28, 2021, served the foregoing **Memorandum**, upon all parties, by electronically filing to all ECF registered parties.

/s/ Adam Hornstine
Adam Hornstine